

BUDD LARNER, P.C.
Averim Stavsky, Esq. (AS-5238)
Attorneys for Plaintiff
Allianz Global Risks U.S. Insurance
Company, as subrogee of Stage Stores, Inc.
140 Broadway, 46th Floor
New York, New York 10005
(212) 858-7700

FILED
U.S. DISTRICT COURT
2007 OCT 19 PM 1:10
S.D. OF N.Y.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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ALLIANZ GLOBAL RISKS U.S.
INSURANCE COMPANY, as subrogee of
STAGE STORES, INC.,

Plaintiff,

- against -

L'OREAL U.S.A.,

Defendant.
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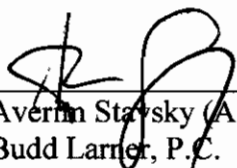
: Case No.: 07-CV-2941 (WHP)
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: NOTICE OF MOTION FOR
: *PRO HAC VICE* ADMISSION
: OF MELINDA A. DAVIS,
: PURSUANT TO LOCAL RULE 1.3(c)

PLEASE TAKE NOTICE THAT, upon the annexed Affidavit of Averim Stavsky, Esq., dated October 16, 2007, together with a Certificate of Good Standing attached thereto, plaintiff, Allianz Global Risks U.S. Insurance Company, as subrogee of Stage Stores, Inc., by its counsel, will move this Court before the Honorable William H. Pauley, III at the United States Courthouse located at 500 Pearl Street, Room 2210, New York, New York, as soon as counsel can be heard for an Order pursuant to Rule 1.3(c) of the Local Rules for the Southern and Eastern Districts of New York admitting Melinda A. Davis, Esq., *pro hac vice*, to the Bar of this Court for the purposes of the litigation of the above-captioned action only and for such other and further relief as this Court may deem just and proper.

630720 #25 10-19-07 mcl

Dated: New York, New York
October 16, 2007

By:


Averin Stavsky (AS-5238)
Budd Larner, P.C.
140 Broadway, 46th Floor
New York, New York 10005
(212) 858-7700

- and -

Denenberg & Tuffley, PLLC
21 E. Long Lake Road, Suite 200
Bloomfield Hills, MI 48304
(248) 549-3900

Attorneys for Plaintiff
Allianz Global Risks U.S. Insurance
Company, as subrogee of
Stage Stores, Inc.

TO: Raymond A. Selvaggio, Esq.
Pezold Smith Hirschmann & Selvaggio, LLC
Attorneys for Defendant
L'Oreal U.S.A.
120 Main Street
Huntington, New York 11743
(631) 427-0100

Allianz-L'Oreal – Notice of Motion pro hac vice (M. Davis) 101207.doc

ATTORNEY'S AFFIRMATION OF SERVICE

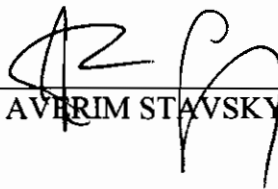
AVERIM STAVSKY, an attorney duly admitted to practice law before the Courts of the State of New York, and counsel to the law firm of Budd Lerner, P.C., affirms the following to be true, under the penalty of perjury:

That on the 16th day of October 2007, I served the annexed Notice of Motion for *pro hac vice* Admission, Affidavit in Support and Order as follows:

Upon: Raymond A. Selvaggio, Esq.
Pezold Smith Hirschmann & Selvaggio, LLC
Attorneys for Defendant
L'Oreal U.S.A.
120 Main Street
Huntington, New York 11743
(631) 427-0100

by depositing a true and accurate copy of same, enclosed in a post-paid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Post Office within the State of New York.

Dated: New York, New York
October 16, 2007



AVERIM STAVSKY

BUDD LARNER, P.C.
 Averim Stavsky, Esq. (AS-5238)
 Attorneys for Plaintiff
 Allianz Global Risks U.S. Insurance
 Company, as subrogee of Stage Stores, Inc.
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 New York, New York 10005
 (212) 858-7700

SUPREME COURT OF THE STATE OF NEW YORK
 COUNTY OF NEW YORK

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| ALLIANZ GLOBAL RISKS U.S. | : Case No.: 07-CV-2941 (WHP) |
| INSURANCE COMPANY, as subrogee of | : |
| STAGE STORES, INC., | : |
| | : |
| Plaintiff, | : AFFIDAVIT IN SUPPORT OF |
| | : THE <i>PRO HAC VICE</i> ADMISSION |
| - against - | : <u>OF MELINDA A. DAVIS</u> |
| | : |
| L'OREAL U.S.A., | : |
| | : |
| Defendant. | : |
| -----X | |

STATE OF NEW YORK)
 : SS.:
 COUNTY OF NEW YORK)

AVERIM STAVSKY, being duly sworn, deposes and states as follows:

1. I am counsel to the law firm of Budd Lerner, P.C. and admitted to practice in the Courts of the State of New York and before the United States District Court for the Southern District of New York.

2. This affidavit is submitted in support of the instant motion by plaintiff, Allianz Global Risks U.S. Insurance Company, as subrogee of Stage Stores, Inc. ("Allianz"), pursuant to Rule 1.3(c) of the Local Rules for the Southern and Eastern Districts of New York for the admission of Melinda A. Davis, Esq., *pro hac vice*, for the purposes of the litigation of the above captioned

matter only.

3. I am serving as local counsel for the plaintiff, Allianz.

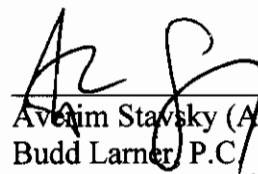
4. Melinda A. Davis, Esq. is an associate in the Michigan office of Denenberg & Tuffley, PLLC. Ms. Davis has been closely involved in this matter as it has become necessary to include additional attorneys for the discovery phase of this action. Since Ms. Davis has intimate knowledge of the subject litigation and is going to take a more active role in the future litigation of this case, it would be appropriate to have her admitted to this Court. As evidenced by the annexed Certificate of Good Standing from the Eastern District of Michigan and the Supreme Court of Michigan, Ms. Davis is in current good standing. The appropriate certificates are incorporated herein by reference. (Exhibit "A").

4. Ms. Davis has familiarized herself with the local rules of Southern District and will abide by the rules and responsibilities which are followed by all attorneys admitted to practice in the State of New York. She will participate in whole or in part in the above-captioned civil action only on behalf of plaintiff, Allianz.

5. Your affiant hereby moves for the admission of Melinda A. Davis, Esq., *pro hac vice*, for participation in the prosecution of this action on behalf of plaintiff, Allianz.

Dated: New York, New York
October 16, 2007

By:


Avram Stavsky (AS-5238)
Budd Larner P.C.
140 Broadway, 46th Floor
New York, New York 10005
(212) 858-7700

- and -

Denenberg & Tuffley, PLLC
21 E. Long Lake Road, Suite 200
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Attorneys for Plaintiff
Allianz Global Risks U.S. Insurance
Company, as subrogee of
Stage Stores, Inc.

TO: Raymond A. Selvaggio, Esq.
Pezold Smith Hirschmann & Selvaggio, LLC
Attorneys for Defendant
L'Oreal U.S.A.
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Allianz-L'Oreal – Affidavit in Support of pro hac vice (M. Davis) 101207.doc

EXHIBIT A

UNITED STATES DISTRICT COURT

Eastern District of Michigan

CERTIFICATE OF GOOD STANDING

I, David J. Weaver, *Clerk of this Court,*

certify that Melinda A. Davis,

was duly admitted to practice in this Court on

August 12, 2002, *and is in good standing*

DATE

as a member of the Bar of this Court.

Dated at Detroit, MI *on* October 4, 2007.

LOCATION

DATE

David J. Weaver
CLERK



THE SUPREME COURT of the STATE OF MICHIGAN

I, Corbin R. Davis, Clerk of the Michigan Supreme Court and Custodian of the Roll of Attorneys admitted to the practice of law in this state, do hereby certify that, as appears from the records,

Melinda A. Davis

was admitted to the practice of law in the courts of the State of Michigan on

November 23, 1994

and has remained in good standing since then.

In Testimony Whereof, I set my hand and
affix the seal of the Michigan Supreme
Court on this date: October 02, 2007

John J. Meyer } *Meyer*
Deputy Clerk

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BUDD LARNER, P.C.
 Averim Stavsky, Esq. (AS-5238)
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SUPREME COURT OF THE STATE OF NEW YORK
 COUNTY OF NEW YORK

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| ALLIANZ GLOBAL RISKS U.S. | : Case No.: 07-CV-2941 (WHP) |
| INSURANCE COMPANY, as subrogee of | : |
| STAGE STORES, INC., | : |
| | : |
| Plaintiff, | : [PROPOSED] ORDER ADMITTING |
| | : <u>COUNSEL PRO HAC VICE</u> |
| - against - | : |
| | : |
| L'OREAL U.S.A., | : |
| | : |
| Defendant. | : |
| -----X | |

Upon consideration of the Motion by plaintiff, Allianz Global Risks U.S. Insurance Company, as subrogee of Stage Stores, Inc., for the admission of Melinda A. Davis, Esq., *pro hac vice*, and the Certificates of Good Standing submitted therewith; and good cause appearing therefore, now, therefore,

It is hereby ORDERED that

The Motion is granted and that Melinda A. Davis, Esq. Is admitted to practice *pro hac vice* as counsel for the plaintiff, Allianz Global Risks U.S. Insurance Company, as subrogee of Stage Stores, Inc., in the above-captioned action.

IT IS SO ORDERED.

Dated: New York, New York
 October , 2007

 William H. Pauley, III
 United States District Judge